TSCA Section 6(e) PCB Inspection

Safety-Kleen(PPM), Inc.
Philadelphia Operations
4105 Whitaker Avenue
Philadelphia, PA 19124

Date of Inspection: September 22, 1999

EPA Representative: Charles Hufnagel
Environmental Engineer

Facility Representatives: Dan B. Glenn
Facility Manager

Lorie McCarney
Records Coordinator

Background

The purpose of this inspection was to document and verify the compliance status of Safety-Kleen(PPM), Inc., Philadelphia Operations, with federal TSCA regulations concerning the handling, storage and disposal of PCB and PCB items. EPA had previously inspected this facility, formerly PPM (USPCI), as a Commercial Storage and Alternate Disposal facility in 1988, 1989, 1990, 1992, 1993 and 1994.

Opening Conference

On September 22, 1999, at about 1015, the EPA representative met with Mr. Dan Glenn, Facility Manager, Safety-Kleen(PPM), Inc., Philadelphia Operations. He presented his credentials and the TSCA Notice of Inspection and TSCA Inspection Confidentiality Notice to Mr. Glenn who signed both forms.

Facility Description

Safety-Kleen(PPM), Inc., Philadelphia Operations, operates only as a commercial PCB storage facility and PCB transporter. The facility, as PPM Inc. (USPCI) and, more recently Laidlaw Environmental Services (Tucker), Inc., had also operated as an alternate disposal facility for PCB oil but this operation ceased in December 1996.

Laidlaw purchased PPM Inc. in 1994 and Safety-Kleen in 1998 and renamed the PPM facilities Safety-Kleen(PPM), Inc. (The subject report will subsequently refer to the Philadelphia facility as PPM).

In addition to operating under an EPA interim permit as a commercial PCB storage facility, PPM also operates under a PADEP residual waste permit.

In-Service Equipment

PPM has never had any in-service PCB electrical, hydraulic or heat transfer equipment.

Alternate Disposal

PPM had treated PCB oil (essentially mineral oil < 10,712 ppm PCB) on site by means of their sodium based chemical destruction process (PPM Process) using their "fixed-site" mobile unit (Rig # 7). PPM's National PCB Chemical Destruction Permit (4/7/86) allowed them to treat mineral oil dielectric fluid (MODEF) up to 10,712 ppm PCB and required a reduction in concentration to <2 ppm PCB.

According to Mr. Glenn, the PPM Process operation ended as a result of a fire (12/96) caused by sodium on the clean oil side of the process rig. The oil (~400 gal.) was non-PCB. Laidlaw Environmental Services (Tucker), Inc., the facility name at that time, reported this incident to EPA Region III.

Except for the oil remaining in the reactor after the fire, all PCB contaminated oil stored on site for treatment was hauled to Laidlaw's facility in Tucker, GA for similar treatment. Another mobile rig was temporarily brought in to the Philadelphia facility to complete treatment of the oil remaining in the reactor.

At the time of the subject inspection, cleanup for closeout of the tank farm where the PPM Process operated had been underway. The tank farm only contained 2 empty, clean (treated) oil storage tanks as all contaminated oil storage tanks and the damaged mobile rig had been disposed of as PCB and other process equipment, etc. had been removed from the site. At this time, the tank farm cleanup levels had not quite reached 10 ug/100 cm2 according to Mr. Glenn who indicated that the facility was doing their own cleanup but Black and Veatch (consulting engineers) would certify the cleanup. The facility had notified EPA Region III of the closure of the tank farm.

The facility's on-site laboratory has also been eliminated with the PPM Process. Any necessary analyses, including cleanup samples, are performed by the facility in Tucker, GA, Safety-Kleen Corp. (Tucker Operations).

The following checklists are included as part of the subject inspection report: Storage for Disposal, Recordkeeping and Subpart K.

Closing Conference

On 9/22/99, the EPA representative reviewed the subject inspection findings with Mr.Glenn and obtained copies of the appropriate documents. Mr. Glenn signed the Receipt for Samples and Documents and the Declaration of Confidential Business Information declaring the Warehouse Inventory Report and warehouse photographs as CBI. Essentially, Mr. Glenn was claiming

their customers' names and their transformer storage arrangement in the warehouse as confidential.

Summary of Findings

Safety-Kleen(PPM), Inc., Philadelphia Operations, operates only as a commercial PCB storage facility (interim permit) and PCB transporter. The facility, as PPM Inc. (USPCI) and, more recently Laidlaw Environmental Services (Tucker), Inc., had also operated as an alternate disposal facility for PCB oil but this operation (PPM Process) ceased in December 1996. The facility has notified EPA Region III and has begun closure/cleanup procedures of the tank farm where the disposal process operated.

The following was noted during the subject inspection:

- Four pad-type PCB Transformers stored within the containment area of the storage warehouse had been leaking. None of the leaks appeared to have dripped onto the floor although 2 of the transformers had dripped onto their pallets. A pole-type PCB Transformer had oil on its lid although no leak was apparent. Also, a spot of oil (~24 in2) with "speedy-dry" absorbent scattered on it was noted on the floor in the area where the pole-type transformers were being stored.

The facility cleaned up these oil leaks at the time of the subject inspection and reportedly contained and stopped the active leaks.

- One PCB Transformer in storage had no out of service date indicated on it. The facility's records had the date which indicated that the transformer had been out of service for less than a year.

- Inspection records for the storage warehouse were not available for February, March and April 1999 but were found subsequent to the subject inspection.

- The 1998 annual document log had not yet been completed due to a computer problem. The document (computer printout) had been started (6 months completed) and the data and records were available, however.

NOTE: In telecons (7/27/00, 8/22/00) subsequent to the subject inspection, the EPA (FIP) representative discussed the status of drained PCB Contaminated Transformers with Mr. Dan Glenn, Facility Manager (215-425-5144). Mr. Glenn indicated that they prefer to ship the transformers with a manifest although some are shipped with a bill of lading, instead. The transformers are marked "non-hazardous" and "non-regulated" for DOT and TSCA.

The EPA representative expressed concern over marking the drained transformers with "non-regulated" labels since disposal is now regulated although storage for disposal, recordkeeping and manifesting remain non-regulated. Mr. Glenn indicated that Safety-Kleen(PPM) controls where the transformers go. Except for those transformers that the customer wants disposed as PCB Transformers, all other drained PCB Contaminated Transformers are shipped to one of 2 facilities with industrial furnaces for reclamation of the metal (copper, etc.). One is owned by Safety-

Kleen(PPM) and both meet the upgraded furnace requirements of the "mega rule".

Although Safety-Kleen(PPM) may insure proper disposal, are the drained PCB Contaminated Transformers allowed to be marked "non-regulated" in view of the requirements for disposal?

II STORAGE FOR DISPOSAL (Regulatory threshold = 50 ppm)

(If PCB items are in storage for disposal, complete Table 3)

761.65(a)(1)

1. Were any PCB Articles, PCB Containers or other PCB items in storage for disposal for more than one (1) year from the date in which the item was removed from service for disposal? ____Yes _✓_No

761.65(a)(2)

If yes, did the facility obtain a one (1) year extension from EPA?
____Yes ____No

761.65(b)(1)(i)

2. Does the storage facility have an adequate roof and walls to prevent rain water from reaching the stored PCBs or PCB Items? _✓_Yes ____No

761.65(b)(1)(ii)

3. Does the storage facility have an adequate floor with continuous curbing at least six inches high? _✓_Yes ____No

4. What are the dimensions of the curbed storage area?
118' Length 57'8" Width 9" Depth

5. List below the internal volume of the largest PCB Article or Container in the storage area (1) and the figure representing 25 percent of the total internal volume of all the PCB Articles or Containers in the storage area (2):

(1) 55 gal. drum = largest full container (oil, water)

(2) 54 drums + some small transformers ≈ 65 drum equivalent
< 600 " " (capacity)

761.65(b)(1)(ii)

6. Does the floor and curbing provide a containment volume equal to at least two times the internal volume of the largest PCB Article or Container stored therein or 25 percent of the total internal volume of all the PCB Articles or Containers stored therein, whichever is greater?
✓ Yes ____No

761.65(b)(1)(iii)

7. Are there any drain valves, floor drains, sewer lines, or other openings that would allow liquids to flow from the curbed storage area?
____Yes ✓ No

If yes, describe which type of potential outlet is present.

_____

_____

_____

761.65(b)(1)(iv)

8. Are the storage area floor and curbing constructed of continuous smooth and impervious materials, such as Portland cement, concrete or steel, to prevent or minimize penetration of PCBs? ✓ Yes ____ No

What material was used for construction of storage area?

Concrete floor and concrete curbing. Cracks in floor are sealed routinely with epoxy.

761.65(b)(1)(v)

9. Is the storage area located at a site that is below the 100-year flood water elevation? ____ Yes ✓ No ____ Unknown

provided w/1988 PCB Inspection Report (PPM Inc.)

If no, provide documentation that the storage area is above the 100-year flood water elevation. If unknown, obtain as much information as possible so that determination can be made in the Region.

761.65(c)(5)

10. Are PCB Articles and PCB Containers in storage for disposal checked for leaks at least once every 30 days? ✓ Yes ____ No

761.65(c)(5)

11. Are records available which document when inspections of the storage facility are performed, by whom and the results of such inspections? ✓ Yes ____ No

If yes, obtain copies reviewed 1997, 1998 and 1999 records on site essentially weekly (1997, 1998), essentially daily (since May 1999) although

12. Are there any leaking PCB Articles or PCB containers in storage for disposal? ✓ Yes ____ No

no records available for Feb. March, Apr which were week records found subsequent to the subject inspection

761.65(c)(5)

13. Have the contents of leaking PCB Articles or PCB Containers in storage for disposal been transferred to properly marked non-leaking containers? ____ N/A * Yes ____ No

If no, explain why: * Ref. Pertinent Comments

761.65(c)(5)

14. Have spilled or leaked materials from PCB Articles or PCB Containers in storage for disposal been immediately cleaned up using absorbents or other adequate means?

____ N/A ✓ Yes ____ No

If no, explain why:

_____

_____

_____

_____

761.65(c)(6)

15. Are all containers used for the storage of liquid or non-liquid PCB waste in accordance with DOT regulations (49 CFR §171-180)?
_____N/A ___✓___Yes _____No

761.65(c)(7)(ii)

16. Has an SPCC plan been prepared and implemented in cases where PCB liquids are stored in containers (incl. tanks) that are larger than those specified in the DOT regulations (i.e. 55 gal drums)?
_____N/A ___✓___Yes _____No
only tankertrucks (8000 gal.)

761.65(c)(8)

17. Are PCB Articles and PCB Containers dated as to when they were placed in storage? ___✓___Yes _____No
except 1 PCB Transformer was found to have no OOS date but records indicated OOS date < 1 year

761.65(c)(8)

18. Is storage managed so that the PCB Articles and PCB Containers can be located by the date they entered storage? ___✓___Yes _____No

761.65(c)(8)

19. Are records available which indicate the date and quantity of each batch of PCBs either added to or removed from large (> 55 gallon) containers in storage? ___✓___N/A _____Yes _____No

20. Does the facility store any bulk PCB remediation waste or PCB bulk product waste at the clean-up site or site of generation?
_____Yes _____No N/A

If yes, answer the following questions:

761.65(c)(9)

a. Has the waste been stored for 180 days or less?
_____Yes _____No

b. Is the waste placed in a pile designed and operated to control wind dispersion? _____Yes _____No

c. Does the waste generate leachate? _____Yes _____No

d. Is the storage site provided with a liner, a cover and a run-on control system? _____Yes _____No

761.40(a)(10)

21. Is each storage area and the PCB Items stored therein for disposal properly marked with a M_L label? ✓ Yes _____ No

If no, describe items not properly marked:

_____

_____

_____

_____

22. Does the facility utilize a temporary storage area for PCB Items? _____ Yes ✓ No

If yes, list types of PCB Items in temporary storage and answer the following questions:

_____

_____

_____

23 thru 28 N/A

761.65(c)(1)

23. Have any PCB Items been in temporary storage in excess of 30 days? _____ Yes _____ No

If yes, how much in excess of 30 days?

_____

761.65(c)(1)

24. Is there a notation on PCB Items in temporary storage indicating when the item was removed from service? _____ Yes _____ No

761.65(c)(1)(ii)

25. Are there any leaking PCB Articles or PCB Equipment in temporary storage which have not been placed in a non-leaking container that contains a sufficient amount of sorbent material? _____ Yes _____ No

761.65(c)(1)(iv)

26. Has an SPCC plan been prepared for a temporary storage area where PCB Containers containing liquid PCBs at a concentration ≥50ppm are being stored? ✓ N/A _____ Yes _____ No

761.65(c)(1)(iv)

27. Are PCB containers containing liquid PCBs at a concentration ≥50 ppm in temporary storage authorized by DOT regulations (49 CFR §171-180)? _____N/A _____Yes _____No

761.65(c)(3)

28. Is the temporary storage area properly marked with an M_L label? _____Yes _____No

29. Does the facility store any PCB items on pallets next to a designated storage area? _____Yes ✓ No

If yes, list PCB Items stored at that location:

761.65(c)(2)

30. Does the storage facility have immediately available unfilled storage equal to 10 percent of the volume of PCB large, high voltage capacitors and PCB contaminated electrical equipment stored outside the facility? _____Yes _____No

N/A

761.65(c)(2)

31. Are the capacitors or other electrical equipment stored outside the facility checked for leaks at least weekly? _____Yes _____No

N/A

32. Is the facility a commercial storage facility (i.e., accepts PCB wastes from other facilities)? ✓ Yes _____No

If yes, answer the following:

761.65(d)(1) & (2)

a. Has the facility received final approval from EPA to operate as a commercial storage facility? _____Yes * No

If yes, obtain evidence, including proof that it has met financial responsibility requirements and has an acceptable closure plan.

[redacted] * Facility has been in operation since 1986. Refer to Pre-Audit Package (Appendix D) for financial/closure related information. Facility, to date, has always operated under an interim permit, as a commercial storage facility.

Pertinent Comments (Storage For Disposal):

Since the elimination of the tank farm operation, the facility has no bulk storage other than by tanker truck. Oil is stored in 55 gal. drums in the warehouse but is normally pumped from the drums to tanker trucks when hauled for treatment or disposal.

The facility drains all PCB and PCB Contaminated Transformers that contain oil with all drained oil stored in 55 gal. drums or pumped directly to a tanker truck. Flushing fluid generated on site is similarly handled. PCB Transformers to be landfilled are flushed with treated mineral oil (<2 ppm) from their Tucker, GA facility to where it is returned for treatment after flushing.

At the time of the subject inspection, there were several types of PCB Items stored within the curbed containment area of the warehouse which included transformers, capacitors, coupling capacitors, bushings, light ballasts, drums of transformer fluid (including askarel, mineral oil dielectric fluid, mineral oil flushing fluid), drums of liquid waste (berm water from tank farm and sludge), drums of debris and crushed drums. Drained PCB Contaminated Transformers (<500 ppm) were stored within the warehouse but outside the curb. Other unregulated items stored on site, outside of the warehouse included non-PCB (<50 ppm) gas meters and elevator parts. Since about mid-1999, the warehouse inspection frequency has increased from weekly to daily.

During the tour of the warehouse, there was oil noted on 5 PCB Transformers. Four pad-type transformers were noted to have been leaking. According to the Warehouse Inventory Report, two of these transformers (Unit ID #2063, #2064) from the same customer (Job ID #266) had been drained and the other 2 transformers (Unit ID #3370, #3371) from another customer (Job ID #378) had not yet been drained. Leaks were noted from one of the drained transformer's drain valves and from bushings or cooling fins on each of the transformers. None of the oil appeared to have dripped onto the floor although two of the leaks had dripped onto their respective transformer's pallets. In another area where pole-type transformers were stored, oil was also noted on the lid of a 75 KVA transformer (Job ID #178/Unit ID #911) although it didn't appear to be a leak. There was also an oil spot (~24 in2) on the floor which did not appear to have come from any particular transformer in the area at this time. PPM had previously scattered "speedy-dry" absorbent on it.

PPM cleaned up the leaks at the time of the subject inspection. Mr Glenn indicated that upon discovery leaks are cleaned up (absorbent, double wash/double rinse with mineral spirits) and contained as necessary. Smaller transformers are placed in containment pans until drained and larger transformers are drained right away.

Reference may be made to the Warehouse Inventory Report for a listing of all items in storage at the end of 9/20/99. Photographs of the warehouse and the tank farm may also be

referred to. These documents have been forwarded to Region III under separate cover as confidential business information (CBI).

g. Total weight of bulk PCB waste that was placed into storage for disposal or disposed during the calendar year?
_____Yes _____No _____N/A

761.180(a)(2)(iv), (v) & (vi)

8. For PCBs and PCB Items remaining in service at the end of the calendar year, do records indicate the following:

a. Total number of PCB Transformers?
_____Yes _____No _____N/A

b. Total weight (kg) of PCBs in transformers?
_____Yes _____No _____N/A

c. Total number of large high or low voltage PCB Capacitors?
_____Yes _____No _____N/A

d. Total weight (kg) of PCBs and PCB Items in PCB Containers?
_____Yes _____No _____N/A

e. Identification of contents of PCB containers (liquids, capacitors, etc.)? _____Yes _____No _____N/A

761.180(a)(2)(vii)

9. For any PCBs or PCB Items received from or shipped to another facility owned or operated by the same generator, does the annual document log contain the same information as asked in Question No. 6?
_____Yes _____No _____N/A

761.180(a)(2)(viii)

10. Does the facility's annual document log contain a record of each telephone call (or other means of verification) made to each commercial storer or disposer to confirm receipt of PCB waste transported by an <u>independent</u> transporter?
_____Yes _____No _____N/A

761.180(a)(2)(ix)

11. Does the facility's annual document log contain the name, address and telephone number of the person to whom a PCB item containing >50ppm PCB, excluding small capacitors, has been distributed in commerce for reuse along with date of transfer and the serial or internal identification number of the item? _____Yes _____No _____N/A

Skip to next section of checklist

Questions for Disposer (*)/Commercial Storer (✓) Facilities (check appropriate type) * ceased operations as an alternate disposer in 12/96

12. Has the facility developed and maintained all annual records and the annual document log as of July 1, 1991, and each year thereafter?
** Yes _____No ** 1998 ADL not complete at this time due to computer problem

a. Are the annual records and the annual document log prepared on a calendar year basis? ✓ Yes _____No

b. Has the facility retained the annual records and the annual document logs for at least three (3) years after it no longer used or stored PCBs or PCB Items? ✓ Yes _____ No

c. Has the facility prepared and submitted to the EPA Regional Administrator annual reports by July 15th for each preceding calendar year? ✓ Yes _____ No

13. Where are the records maintained? on site

a. How are the records compiled and by whom? Computer system by Facility Manager, Records Coordinator

761.180(b)(1)(i) & (ii)

14. Do the facility's annual records contain the following:

a. All signed manifests generated or received by the facility during the calendar year? ✓ Yes _____ No

b. All Certificates of Disposal that have been generated or received by the facility during the calendar year? ✓ Yes _____ No

c. Records of inspections and clean-ups? ✓ Yes _____ No

761.180(b)(2)(i) & (ii)

15. Does the written annual document log contain the following:

a. The name, address, and EPA identification number of the facility? ✓ Yes _____ No

b. The calendar year covered by the annual document log? ✓ Yes _____ No

c. The unique manifest number of every manifest generated or received by the facility during the calendar year and the name and address of the generator? ✓ Yes _____ No

761.180(b)(2)(ii)(A)

16. Does the written annual document log contain the following information from each manifest and for unmanifested waste that may be stored or disposed of at the facility:

Bulk PCB waste (e.g. in a tanker or truck) _____ N/A

a. Its weight in kilograms? ✓ Yes _____ No

b. The first date it was removed from service for disposal? ✓ Yes _____ No

c. The date it was received at the facility? ✓ Yes _____ No

d. The date it was placed into transport for off-site storage or disposal? ✓ Yes _____ No

e. The date of disposal, if known? ✓ Yes _____ No

761.180(b)(2)(ii)(B)

PCB Articles (e.g. transformer or capacitor) _____ N/A

a. The serial number (if available) or other means of identifying each PCB Article (not in a PCB Container or PCB Article Container)? ✓ Yes _____ No

b. The weight in kilograms of the PCB waste in each PCB Article? ✓ Yes _____ No

c. The date it was removed from service for disposal? ✓ Yes _____ No

d. The date it was received at the facility? ✓ Yes _____ No

e. The date it was placed in transport for off-site storage or disposal? ✓ Yes _____ No

f. The date of disposal, if known? ✓ Yes _____ No

761.180(b)(2)(ii)(C)

PCB Containers _____ N/A

a. A unique number identifying each PCB Container? ✓ Yes _____ No

b. A description of the contents of each PCB Container? ✓ Yes _____ No

c. The total weight in kilograms of the material in each PCB Container? ✓ Yes _____ No

d. The first date material (PCB Waste) placed in each PCB Container was removed from service for disposal? ✓ Yes _____ No

e. The date it was received at the facility? ✓ Yes _____ No

f. The date each container was placed in transport for off-site storage or disposal? ✓ Yes _____ No

g. The date of disposal, if known? ✓ Yes _____ No

761.180(b)(2)(ii)(D)

PCB Article Containers _____N/A

a. A unique number identifying each PCB Article Container?
✓ Yes _____ No

b. A description of the contents of each PCB Article Container?
✓ Yes _____ No

c. The total weight in kilograms of the contents (PCB Waste) of each PCB Article Container? ✓ Yes _____ No

d. The first date a PCB Article placed into each container was removed from service for disposal? ✓ Yes _____ No

e. The date it was received at the facility? ✓ Yes _____ No

f. The date the container was placed in transport for off-site storage or disposal? ✓ Yes _____ No

g. The date of disposal, if known? ✓ Yes _____ No

17. Does the facility use EPA's "PCB VOLUNTARY FORM FOR THE ANNUAL REPORT" to document the annual report? ✓ Yes _____ No

761.180(b)(3)(i) & (ii)

18. Does the facility's annual report contain the following information:

a. The name, address, and EPA identification number of the facility?
✓ Yes _____ No

b. A list of the numbers of all signed manifests of PCB waste initiated or received by the facility during the calendar year?
✓ Yes _____ No

761.180(b) (3) (iii), (iv), (v), & (vi)

19. Does the facility's annual report include the total weights and total numbers, by PCB waste type (bulk, transformers, capacitors, article containers, and containers) in each of the following categories:

a. In storage at the facility at the beginning of the calendar year?
✓ Yes _____ No

b. Received or generated at the facility during the calendar year?
✓ Yes _____ No

c. Transferred to another facility during the calendar year?
✓ Yes _____ No

d. Disposed of at the facility during the calendar year?
✓ Yes _____ No

1997 final year for alternate disposal on record (ceased operations in 12/96 after fire but treated oil remaining in reactor (at time of fire) in 1997)

e. - Remaining in storage for disposal at the facility at the end of the calendar year? ✓ Yes _____ No

(Refer to EPA's "PCB Voluntary Form For The Annual Report" as a guide to answering this question)

Pertinent Comments

As noted above, the 1998 annual document log had not been completed at the time of the subject inspection due to a computer problem. The document (computer printout) had been started and the data and records were available, however. (6 months completed)

The 1997 annual document log was complete and generally appeared to have the required information.

SUBPART K - PCB WASTE DISPOSAL RECORDS AND REPORTS
(40 CFR Part 761.202-761.218)

761.205(c)(2)

20. Is the facility exempt from the EPA notification requirements because it is only a generator of PCB waste through its use, owning, servicing or processing of PCBs or PCB items but does not own or operate a designated storage for disposal area subject to the requirements of §761.65(b) or §761.65(c)(7)? _____Yes ___✓___No

If yes, skip to question 25c

761.202(c)

21. Has the facility engaged in PCB waste handling activities on or prior to February 5, 1990? ___✓___Yes _____No

761.202

22. Has the facility applied for an EPA identification number?
___✓___Yes _____No

If yes, what was the date of the application and has the ID number been officially issued?

EPA letter 3/23/90 Storage Facility PAD 981113749 (originally as PPM Inc.) Ref. Pre-Audit Package (Appendix C) for notifications to EPA (Region III (7/6/98 letter) and OPPT (7/8/98 Notification of PCB Activity)) of most recent name change.

If no, does the facility already have a RCRA identification number?
_____Yes _____No

761.205(b)

If the facility has a RCRA ID number, did it notify EPA of its PCB waste activities by April 4, 1990? _____Yes _____No

761.205(c)(2)(iii)

23. Has the generator submitted separate notifications to EPA for each PCB storage area it owns or operates on different sites or properties?
___✓___Yes _____No _____N/A

761.205(f)

24. Has the facility resubmitted a notification form within 30 days from the time that its waste handling activities changed?
_____Yes _____No ___✓___N/A

25. If the facility did not engage in PCB waste activities until after February 5, 1990 and has not yet received an EPA identification number or if the facility engaged in PCB waste activities on or before February 5, 1990 but has not applied for an EPA identification number have any of the following occurred:

N/A

761.202(b)(c)&(d)

a. The facility is a generator of PCB waste and processed, stored, transported or offered for transport or disposed of such PCB waste after June 4, 1990? _____Yes _____No

761.202(b)(c)&(d)

b. The facility is not a generator of PCB waste but has engaged in transporting, commercial storage or disposal of such PCB waste after June 4, 1990? _____Yes _____No

761.202(b)(c)&)d)

c. The facility is a generator that offered PCB waste to transporters, commercial storers, or disposers who have not received an EPA identification number? _____Yes _____No

761.202(b)(c)&(d)

d. The facility is not a generator of PCB waste but has delivered such waste to a transporter, commercial storer or a disposer that have not received an EPA identification number? _____Yes _____No

761.207(a)

26. Has the generator prepared a manifest whenever it ships PCB waste off-site? ___✓___Yes _____No _____N/A

If No or N/A skip to question 33

761.207(a)

27. Was the manifest prepared on EPA Form 8700-22 with a continuation sheet if necessary? ___✓___Yes _____No

If no, describe what manifest was used.

_____

_____

_____

28. Was the following information specified on the manifest

761.207(a)(1)

a. For each bulk load of PCBs, its identification, the earliest date of removal from service for disposal and its weight in kilograms? ___✓___Yes _____No _____N/A

761.207(a)(2)

b. For each PCB container or article container, an identification number, type of PCB waste, earliest date of removal from service for disposal and its weight in kilograms? ___✓___Yes _____No _____N/A

761.207(a)(3)

c. For each PCB article, its serial number or other identification, date of removal from service for disposal and weight in kilograms of its PCB waste? ___✓___Yes _____No _____N/A

761.207(g)

d. An approved off-site commercial storage or disposal facility for PCB waste? ✓ Yes _____ No

761.209(a)

29. Did the generator of PCB waste, transporter or the storage or disposal facility retain on file copies of the appropriate manifests?
✓ Yes _____ No

761.209(a)

30. Were the manifests properly signed? ✓ yes _____ no

761.208(a)(4)

31. Did the generator receive the hand signed manifest within 35 days after the PCB waste was accepted by the transporter?
✓ Yes _____ No _____ N/A
generally, but will call. No telephone log but receive Fax copy of manifest before original sent.

761.208(a)(4)

If yes, did the generator confirm by telephone or other means (if shipped by an independent transporter) within a day after receiving the hand-signed manifest that the commercial storer or disposer actually received the manifested waste? ✓ Yes _____ No _____ N/A

761.208(a)(4)

If no, did the generator telephone or communicate by other means first with the commercial storer or disposer and then, if necessary, with the transporter to determine the status of the PCB waste?
_____ Yes _____ No _____ N/A never had to call transporter

761.208(a)(4)

32. If the generator has not received a hand-signed manifest from an EPA approved facility within 10 days from the date of the telephone call to the transporter, did it submit an exception report to the EPA Regional Administrator? _____ Yes _____ No ✓ N/A

761.211(a)

33. Is there evidence to indicate that either a transporter or a commercial storer or disposer accepted a shipment of PCB waste after April 4, 1990 without a properly signed manifest? _____ Yes _____ No ✓ N/A

761.211(c)

If yes, describe and state whether an "Unmanifested Waste Report" was submitted to the EPA Regional Administrator within 15 days after the unmanifested PCB waste was received.

761.210(a)

34. Is there evidence to indicate that a significant discrepancy regarding the amount of PCB waste stated on the manifest occurred?
✓ Yes _____No _____N/A

761.210(b)

If yes, describe the discrepancy and attempts to reconcile it, and state whether a letter was submitted to the EPA Regional Administrator if it is was not resolved within 15 days after the PCB waste was received

Weight discrepancies usually resolved within 1 or 2 days.

Answer questions 35 and 36 if the facility is a disposer of PCB waste

Ceased alternate disposal operations in 12/96.

761.215(c)(1)&(2)

35. Does the disposer submit to the EPA Regional Administer, no later than 45 days from the end of the one (1) year storage for disposal date a One-year Exception Report if it receives PCB or PCB items more than 9 months after they were removed from service for disposal and, it could not dispose of the affected PCBs or PCB items within 1 year of the date of removal from service for disposal? _____Yes _____No

761.218(a)&(b)

36. Does the disposer prepare a Certificate of Disposal for each shipment of PCB waste that it accepts and does it send a copy to the generator identified on the manifest within 30 days of the date that disposal of the PCB waste was completed? _____Yes _____No

Answer question 37 if the facility is a generator or commercial storer of PCB waste

761.215(d)(1)&(2)

37. Does the generator or commercial storer submit to the EPA Regional Administrator, no later than 45 days, a One-year Exception Report if it transferred PCB or PCB items to the disposer within 9 months after they were removed from service for disposal and it either has not received, within 13 months after removal from service for disposal, a Certificate of Disposal confirming the disposal of the affected PCBs or PCB items or it receives a Certificate of Disposal confirming disposal more than 1 year after the date of removal from service? _____Yes _____No N/A